

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

In re: Alice Thomas)	
)	
)	Case Number: 18-12376
)	Chapter 13
Debtor(s).)	
)	

REPLY TO TRUSTEE'S AMENDED MOTION TO DISMISS

COME(S) NOW, the Debtor(s), Alice Thomas, through the undersigned counsel, Edward Gonzalez, Esq., and responds to the trustee's motion to dismiss stating as follows:

1. Debtor detailed her reasons for the request for extension of time to file her amended plan in her motion (Docket Entry #44). To wit: Despite repeated requests, IRS still had not amended its proof of claim to state the amount of priority taxes owed at the time the last plan was due --- without that amount, Debtor could not prepare a confirmable plan.
2. The IRS POC has since been amended and a new plan is in process.
3. Debtor is serious about confirming a plan.
4. In fact, she is completely up to date on her payments to the trustee.

WHEREFORE, Debtor respectfully asks the court to deny the trustee's motion to dismiss.

Dated: December 11, 2018

Respectfully Submitted,
/s/ Edward Gonzalez
Edward Gonzalez,
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2405 Eye Street, NW, Suite 1A

Washington, DC 20037
(202) 822-4970

Certificate of Service

I hereby certify that the foregoing was sent by the court's electronic mailing and/or by first class, postage pre-paid, mail to the following:

1. U.S. Trustee
2. Chapter 13 Trustee

/s/ Edward Gonzalez
Edward Gonzalez